

**UNITED STATES BANKRUPTCY COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE: § **BANKRUPTCY CASE NO.**
§
CASING SERVICES & EQUIPMENT, INC., § **10-36130-H1-11**
§

**DEBTOR'S AMENDED APPLICATION FOR AUTHORITY TO EMPLOY
SPECIAL COUNSEL PURSUANT TO 11 U.S.C. § 327**

IF YOU WANT A HEARING, YOU MUST REQUEST ONE IN WRITING, AND YOU MUST RESPOND SPECIFICALLY TO EACH PARAGRAPH OF THIS PLEADING. YOU MUST FILE YOUR RESPONSE WITH THE CLERK OF THE BANKRUPTCY COURT WITHIN TWENTY ONE DAYS FROM THE DATE YOU WERE SERVED AND GIVE A COPY TO THE PERSON WHO SENT YOU THE NOTICE; OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF.

IF A PARTY REQUESTS EMERGENCY CONSIDERATION, THE COURT MAY ACT EXPEDITIOUSLY ON THE MATTER. IF THE COURT ALLOWS A SHORTER RESPONSE TIME THAN TWENTY ONE DAYS, YOU MUST RESPOND WITHIN THAT TIME. IF THE COURT SETS AN EMERGENCY HEARING BEFORE THE RESPONSE TIME WILL EXPIRE, ONLY ATTENDANCE AT THE HEARING IS NECESSARY TO PRESERVE YOUR RIGHTS. IF AN EMERGENCY HEARING IS NOT SET, YOU MUST RESPOND BEFORE THE RESPONSE TIME EXPIRES.

TO THE HONORABLE CHIEF UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, CASING SERVICE & EQUIPMENT, INC., the Debtor herein (the "Debtor"), and files this its Amended Application for Authority to Employ Special Counsel Pursuant to 11 U.S.C. § 327 (the "Application"), and in support thereof, would respectfully show unto the Court as follows:

I.

The Debtor has filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code on July 23, 2010 (the "Date of Petition"). From and since the Date of Petition, the Debtor has maintained possession of its property, and has continued to remain in control of its ongoing business affairs as a Debtor-in-possession pursuant to the provisions of 11 U.S.C. §§ 1107 and 1108.

II.

This Court has jurisdiction over the proceedings herein pursuant to 11 U.S.C. § 105, and 28 U.S.C. §§ 151, 157, and 1334. Venue is appropriate herein by virtue of 28 U.S.C. § 1408.

III.

Debtor has selected James R. Jones, 25211 Grogan's Mill Road, Suite 240, The Woodlands, Texas 77380, and proposes to employ him for the purpose of collecting two judgments, one for \$104,648.21, including interest and attorney's fees, granted to Debtor in Cause No. 2007-46540, *In Re: Casing Services & Equipment, Inc. vs. Oil Rock Energy, Inc.*, in the 152nd Judicial District Court of Harris County, Texas, and one for \$70,687.50 plus \$23,560.14 in attorney's fees against J.H.P. Operating, LLC d/b/a J.H.P. Operating.

Debtor has selected James R. Jones for the reason that he represented the Debtor in obtaining both judgments and as such has the expertise to properly represent the Debtor in this matter.

IV.

To the best of Debtor's knowledge James R. Jones has no connections with the Debtor, creditors, or any other party in interest, their respective attorneys and accountants, the U.S. Trustee or any person employed in the office of the U.S. Trustee, other than he previously represented Mrs. Andra Vanarsdel, president of Casing Service & Equipment, Inc., in the shareholder/director dispute, as well as Shanda, LLP in the 2nd 25th District Court of Colorado County, Texas under Cause No. 22,349; *In Re: Estate of Thomas Ray Tubbs, deceased*. This litigation has now been concluded. He currently represents Mrs. Andra Vanarsdel individually in Cause No. 2008-69880, Shawley Coker, Representative of Sharon Tubbs, et al., as shareholders of Casing Service & Equipment, Inc. and Sharon Tubbs, Thomas Ray Tubbs, Jr. and Shane Tubbs v. Andra Vanarsdel, in the 133rd District Court of Harris County, Texas. He is also counsel for Shanda LLP in Cause No. 2010-28324, *T &*

T Tool & Supply, Inc. vs. Shanda, LLP; In the 157th District Court of Harris County, Texas, and sees no conflict of interest in representing the Debtor in collecting the judgments against these judgment debtors as these matters are unrelated.

James R. Jones represents no interest adverse to the Debtor or its estate in the matters upon which he will be engaged by the Debtor. Retention and employment of him would be in the best interests of the Debtor and its estate. The Board of Directors has unanimously agreed that Mr. Jones should be appointed to collect these judgments for the Debtor. The Affidavit of Proposed Special Counsel pursuant to 11 U.S.C.A. § 327(e) and Fed. R. Bkcy. P. 2014 is attached hereto and incorporated herein for all purposes as Exhibit "A".

V.

At the present time James R. Jones charges a percentage of 33.33% for services of this nature of any and all sums of money and property recovered in the collection of the judgment, but has agreed to accept 20%.

Pursuant to 11 U.S.C. §§330 and 331, if any compensation is sought from the Debtor in this matter by James R. Jones it will be subject to the scrutiny and authority of this Court.

WHEREFORE, PREMISES CONSIDERED, CASING SERVICE & EQUIPMENT, INC., the Debtor herein, prays for this Court to authorize the Debtor to employ James R. Jones, 25211 Grogan's Mill Road, Suite 240, The Woodlands, Texas 77380, on the percentage basis of 20.00% of any and all sums of money and property recovered in the collection of the judgments.

Respectfully submitted,

/s/ Margaret M. McClure

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ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served electronically or by U.S. mail on the 30th day of April, 2011, on all parties in interest set out on the attached matrix.

/s/ Margaret M. McClure

MARGARET M. MCCLURE